

No: 18-

Date: October 17, 2018

RESOLUTION  
OF THE CITY COUNCIL  
CITY OF SANDPOINT

**TITLE: SCOPING COMMENTS ON THE PROPOSED PACWEST SILICON SMELTER  
IN PEND OREILLE COUNTY, WASHINGTON**

WHEREAS: The Washington State Department of Ecology is developing a draft Environmental Impact Statement (EIS) for the proposed PacWest Silicon Smelter in Pend Oreille County, Washington; and

WHEREAS: The City of Sandpoint was designated a moderate PM-10 nonattainment area upon enactment of the Clean Air Act Amendments of 1990 that controls emission limitations on industrial sources and the project description does not articulate the specific types of pollutants that will be released into the air as byproducts of the silicon smelting process; and

WHEREAS: The PSD Modeling Protocol provided by PacWest in October 2017 states that operation of the smelter will emit approximately 320,000 metric tons per year of carbon dioxide, 760 metric tons per year of sulfur dioxide and 700 metric tons per year of nitrogen oxides and this is in addition to small and large particulate matter in amounts that are also expected to exceed the Prevention of Significant Deterioration (PSD) threshold; and

WHEREAS: The modeling methods proposed by PacWest to the Washington State Department of Ecology (DOE) to assess air quality impacts of the proposed smelter do not utilize site-specific meteorological monitoring data and are inadequate; and

WHEREAS: Sulphur dioxide and nitrogen oxide airborne pollutants will result from the operation of the proposed smelter that will fall to the ground as acid rain with the additional of acidic particles to Lake Pend Oreille and other water bodies in the greater Sandpoint area that can have serious impacts on ecosystem health; and

WHEREAS: The project description does not include information about the number of trucks and trains that will be necessary to transport 170,000 tons of quartz rock (by train), 150,000 tons of blue gem coal (by train), and 130,000 tons of wood chips (by truck) each year to the proposed project site in Newport, Washington; and

WHEREAS: Noise within the Sandpoint city limits will increase due to a number of trucks and trains needed to transport raw materials to the proposed project site in Newport, Washington.

NOW, THEREFORE, BE IT RESOLVED THAT: The Sandpoint City Council hereby approves the submission of the attached draft letter to the Washington State Department of Ecology (WA DOE) recommending:

- 1) That WA DOE adopt a broad scope that includes the City of Sandpoint and the surrounding region when preparing the draft EIS for the proposed project; and
- 2) Hold future public hearings in the City of Sandpoint; and
- 3) Address the project at full build out rather than the proposed initial phase in the EIS in order to capture the full scope of impacts to the region throughout the project duration; and
- 4) Adequate study air quality, water quality, transportation and noise impacts for the region; and
- 5) Consider the "No Action" alternative for the proposed project.

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Shelby Rognstad, Mayor

ATTEST:

\_\_\_\_\_  
Maree Peck, City Clerk

City Council Members:

	YES	NO	ABSTAIN	ABSENT
1. Eddy				
2. Aitken				
3. Williamson				
4. Ruehle				
5. Aispuro				
6. Darling				

## **DRAFT SCOPING COMMENTS FOR PACWEST SILICON SMELTER**

Date:

To: Washington State Department of Ecology  
C/O Meg Bommarito, Regional Planner  
From: Sandpoint City Council, City of Sandpoint, Idaho

Dear Ms. Bommarito,

Please accept the following scoping comments submitted on behalf of the City of Sandpoint regarding the proposed PacWest Silicon Smelter. We appreciate your careful consideration of these comments when developing the draft Environmental Impact Statement (EIS) for the project.

The City of Sandpoint, along with the wider region, is experiencing significant growth by new residents and businesses due in large part to the high quality of life attributes of the area—an underpinning of a growing knowledge-based economy as well as the travel and tourism sector. The Sandpoint Micropolitan Statistical Area, according to 2017 census data, is the 7<sup>th</sup> fastest growing in the nation and also shows a dramatic increase in older residents who may be more vulnerable to airborne pollutants. In Bonner County, nearly 20% of jobs are directly related to the travel and tourism sector. The competitive aspects of our region relative to the broader economy is dependent, to a large degree, on the quality of our air, water and recreational amenities. Our economic success is also dependent on sustainable transportation infrastructure that may be impeded by the proposed project.

Given the scale and potential regional impacts of this project, it is appropriate that the Washington State Department of Ecology (DOE) adopt a broad scope that includes the City of Sandpoint and the surrounding region when preparing the draft EIS for the proposed project. DOE has already set this precedent when reviewing other projects<sup>1</sup> that had the potential to seriously impact the quality of life of residents that lived outside of the immediate project area. We respectfully request that DOE perform the same due diligence in this case and that future public hearings be held in the City of Sandpoint. We would also like to request that the EIS address the project at full build out rather than the proposed initial phase in order to capture the full scope of impacts to the region throughout the project duration.

### **Project Description:**

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<sup>1</sup> <https://fortress.wa.gov/ecy/publications/documents/1706013.pdf>

The overall project description provided by the DOE<sup>2</sup> is too vague and lacks clarity specifically in the areas of transportation and air emissions. Please refer to the following areas of impact for a more detailed explanation of the components of the project description that are lacking.

#### **Air Quality:**

The City of Sandpoint has invested in and was successfully designated a moderate PM-10 nonattainment area upon enactment of the Clean Air Act (CAA) Amendments of 1990. The Sandpoint PM10 Maintenance Plan, approved by the EPA, controls emission limitations on industrial sources.

The project description does not articulate the specific types of pollutants that will be released into the air as byproducts of the silicon smelting process. These primarily include carbon dioxide, sulfur dioxide, nitrogen oxides and particulate matter among others.

The PSD Modeling Protocol<sup>3</sup> provided by PacWest in October 2017 (then called HiTest Sands), states that operation of the smelter will emit approximately 320,000 metric tons per year of carbon dioxide, 760 metric tons per year of sulfur dioxide and 700 metric tons per year of nitrogen oxides. These compounds are in addition to small (2.5) and large (10) size particulate matter in amounts that are also expected to exceed the Prevention of Significant Deterioration (PSD) threshold. **A comprehensive and accurate accounting of byproduct concentrations must be included in the project description and any analyses/findings included in the draft EIS.**

Furthermore, the modeling methods proposed by PacWest to DOE to assess air quality impacts of the proposed smelter do not utilize site-specific meteorological monitoring data and are therefore inadequate. **We respectfully request that on site meteorological data is collected for one year to most accurately model pollutant dispersal as these pollutants have the potential to significantly degrade Sandpoint's air quality.**

The draft EIS also needs to study and detail the following:

- **How airborne pollutants will impact the respiratory health of residents and visitors of Sandpoint, particularly more vulnerable populations like children and the elderly.**
- **How airborne pollutants will impact visibility in Sandpoint over the course of the year in accordance with other factors such as wood burning stove and wildfire smoke.**
- **How compromised air quality will impact the local economy.**
- **How risks from compromised air quality will be mitigated for.**
- **The effects of airborne pollutants on bird migratory patterns.**

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<sup>2</sup> <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/PacWest-Silicon-project>

<sup>3</sup> [https://9b37abdd1c3135d9659b-298f012ea728efea7c302ad9a6f7bba0.ssl.cf2.rackcdn.com/knrd/HiTest\\_Sand\\_Newport\\_PSD\\_Modeling\\_Protocol.pdf](https://9b37abdd1c3135d9659b-298f012ea728efea7c302ad9a6f7bba0.ssl.cf2.rackcdn.com/knrd/HiTest_Sand_Newport_PSD_Modeling_Protocol.pdf)

- **The effects of Silica dust from open rail cars traveling through Bonner County.**

#### **Water Quality:**

Sulphur dioxide and nitrogen oxide airborne pollutants that will result from the operation of the proposed smelter can be transported long distances. These compounds react with water and oxygen in the air to form sulfuric and nitric acids that fall to the ground as “acid rain” in the form of rain or snow, and even fog and hail. These acidic particles and gases can also attach to surfaces in the absence of moisture via dry deposition.

Acid rain and the addition of acidic particles to Lake Pend Oreille and other water bodies in the greater Sandpoint area can have serious impact on ecosystem health. As pH decreases over time, aquatic plants and wildlife will have different abilities to cope, with some species exhibiting higher sensitive than others. The draft EIS should include a detailed analysis and findings of the following:

- **How prolonged acid exposure resulting from the operation of the silicon smelter will impact the health of aquatic plants and wildlife in the greater Sandpoint area.**
- **How deterioration of Lake Pend Oreille and other waterways within the greater Sandpoint area will impact the economy of Sandpoint.**
- **How risks to ecosystem health and the local economy will be mitigated for.**

#### **Transportation:**

The project description does not include information about the number of trucks and trains that will be necessary to transport 170,000 tons of quartz rock (by train), 150,000 tons of blue gem coal (by train), and 130,000 tons of wood chips (by truck) each year to the proposed project site in Newport, WA.

The routes that these trucks and trains will travel is also not articulated in the project description. The City of Sandpoint is currently investing approximately \$5.3 million in improving our downtown streets and invests approximately \$1.4 million annually on street maintenance throughout the city. Transportation routes and truck/train volumes through Sandpoint must be examined in detail in the draft EIS. Specific questions include:

- **What are the maintenance costs associated with increased truck traffic through Sandpoint related to silicon smelter operations?**
- **Will the anticipated increase in truck traffic necessitate intersection improvements within Sandpoint or other urban areas within Bonner County?**
- **Who is responsible for paying for road maintenance, repair or intersection improvements in Sandpoint associated with increased truck traffic related to silicon smelter operations?**

- What kinds of traffic delays can be expected in Sandpoint because of increased truck and train traffic related to the operation of the silicon smelter? How will associated risks be mitigated for?
- What are the impacts to emergency response (police, fire/EMS) from increased truck and train traffic related to the operation of the silicon smelter? How will associated risks be mitigated for?

#### **Noise:**

Noise within the Sandpoint city limits will increase as a function of the number of trucks and trains needed to transport raw materials to the proposed project site in Newport, WA. Impacts on noise levels also necessitate a thorough analysis of truck/train numbers and routes through the City of Sandpoint. The following should be studied and results detailed as part of the preparation of a draft EIS:

- How truck/train transport will increase ambient noise throughout the city.
- The impact of and risks (health and well-being) associated with increased noise from truck/train transport. How will associated risks be mitigated for?

#### **Alternatives:**

We respectfully request that DOE consider the “No Action” alternative for the proposed project. Under this scenario, DOE should compare the socioeconomic and environmental impacts (to Sandpoint) of the PacWest silicon smelter as currently proposed versus if the proposal were not to occur at all.

#### **Summary:**

Thank you for your careful consideration of these scoping comments. . We look forward to participating in and reviewing a draft EIS that addresses how the proposed PacWest silicon smelter at all phases, including full build out, would directly and indirectly effect the residents, businesses, and visitors of Sandpoint. Clean air, clean water, and good stewardship of taxpayer dollars has a significant impact on our current and future economic and social vitality because local jobs, tourism, and livability are all fueled by a healthy environment.